

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

i2 INC., a Delaware corporation, i2
LIMITED, a British limited company
registered in England and Wales,

Plaintiffs,

v.

PALANTIR TECHNOLOGIES, INC., a
Delaware Corporation, SHYAM
SANKAR, an individual, DR. ASHER
SINENSKY, an individual, SRS
ENTERPRISES, LLC, a Florida limited
liability company and NOCHUR
SANKAR, an individual,

Defendants.

CIVIL ACTION No. 1:10cv885-LO/JFA

**MEMORANDUM IN SUPPORT OF
JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER**

The parties expect that they, and perhaps third parties, will produce discovery materials in this case that contain non-public proprietary and confidential information that would harm the parties if the information were disclosed outside of the litigation. This includes documents containing trade secrets or other confidential or proprietary research, development, technical or commercial information, as well as source code, software processes, and supporting documentation.

The parties have reached an agreement on the terms of a standard Protective Order (“Order”) of the type that Courts in this Division typically enter. *Exhibit 1*. The Order allows the parties to designate discovery materials “Confidential” if the materials contain non-public proprietary or commercially sensitive and/or otherwise confidential material. *Id.*, ¶ 3. The parties may use confidential discovery materials only in connection with this litigation, and they

may disclose confidential discovery materials only to certain classes of persons identified in the Order. *Id.*, ¶¶ 2, 3. The filing of “confidential” discovery material is governed by Local Civil Rule 5, and the Order does not change the requirements of Local Civil Rule 5. *Id.*, ¶ 2. The Order also allows the parties to designate particularly sensitive material as “For Litigating Counsel Eyes Only.” *Id.*, ¶ 5. The Order also gives special protection to source code by enabling the parties to designate this material as “Highly Sensitive Source Code,” which then requires the receiving party to comply with additional measures of protection. *Id.*, ¶ 6.

For these reasons, the parties respectfully request that the Court grant this Motion and enter the Protective Order attached as *Exhibit 1*.

Dated: October 5, 2010

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By: /s/ Robert R. Vieth

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of October, 2010, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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